



United Parcel Service 400 Piedmont Center - Emory North  
Atlanta, GA 30346  
(404) 915-8000

July 16, 1993

Mr. Kevin Turner  
Remedial Project Manager  
U.S. Environmental Protection Agency, HSRM-6J  
77 W. Jackson Blvd.  
Chicago, IL 60604

RE: Request for Information to United Parcel Service, Inc.  
pursuant to section 104(e) of CERCLA for the Sanitary  
Landfill Company (IWD) Site in Moraine, Ohio.

Dear Mr. Turner:

This letter is in response to EPA's request for information received by United Parcel Service, Inc. ("UPS") on May 24, 1993, regarding the Sanitary Landfill Company (IWD) site (the "Site") in Moraine, Ohio.

Based on the documents supplied to UPS by EPA, UPS will respond to this request regarding its facility located at 1308 Brandt Pike, Dayton, Ohio which began operating in April, 1971. That is the only location that was referenced in the documents supplied to UPS by EPA, and is the only facility identified by EPA. UPS objects to these requests to the extent they seek information protected by the attorney/client privilege, the attorney work product doctrine or any other privilege, and to the extent they seek information not relevant to the Site. Subject to these objections, UPS responds as follows:

1. Identify all persons consulted in the preparation of the answers to these Information Requests.

Response: Those consulted in the preparation of the answers to these Information Requests were: Toshi Joji, UPS Midwest Region Environmental Coordinator, and Peter Guinasso, South Ohio District Plant Engineering Manager.

2. Identify all documents consulted, examined, or referred to in the preparation of the answers to these Requests and provide copies of all such documents.

Response: Other than the documents supplied to UPS by EPA, no documents were consulted. UPS has performed a search of its records and has determined that no records exist

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relevant to this Information Request. If any records existed regarding waste disposal, they were likely to be Accounting records which are destroyed after six years pursuant to UPS's record retention policy.

3. If you have reason to believe that there may be persons able to provide a more detailed or complete response to any Information Request or who may be able to provide additional responsive documents, identify such persons.

Response: UPS has no reason to believe that any other person would be able to provide a more detailed response to this Information Request.

4. List the EPA Identification Numbers of the Respondent.

Response: The EPA Identification Number for UPS's facility at 1308 Brandt Pike in Dayton, Ohio is OHD981537681.

5. Identify the acts or omissions of any persons, other than your employees, contractors, or agents, that may have caused the release or threat of release of hazardous substances, pollutants, or contaminants and damages resulting therefrom.

Response: UPS is not aware of any acts or omissions by anyone that may have caused the release or threat of release of hazardous substances, pollutants, or contaminants at the Site.

6. Identify all persons who have or may have knowledge or information regarding the generation, transportation, or disposal of hazardous substances by you, your contractors, or by prior owners and/or operators at the Site.

Response: UPS is not aware of anyone who has or may have knowledge or information regarding the generation, transportation, or disposal of hazardous substances by anyone at the Site.

7. Did you ever dispose, transport for disposal, or arrange for the transportation for disposal of any hazardous substances or other materials at the Site? U.S. EPA is in possession of information showing that Respondent was a customer of Industrial Waste Disposal, Inc. ("IWD"), and that disposal transactions were conducted with IWD on the following dates: 12/12/75,

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8/4/75, 11/7/75. U.S. EPA's information indicates that IWD disposed of Respondent's waste at the Site.

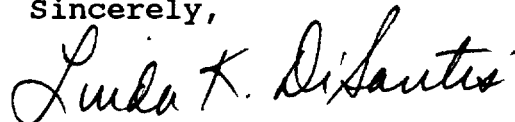
Response: UPS never disposed, transported for disposal, or arranged for the transportation for disposal of any hazardous substances or other materials at the Site. UPS's waste was collected by waste haulers who made arrangements for its disposal. According to the records supplied to UPS by EPA, IWD picked up waste from UPS. However, other than as stated on those documents, UPS has no knowledge of how IWD disposed of UPS's waste. (Questions 7 (a) through 7 (e) are not applicable.)

8. Identify all persons, including yourself, who may have arranged for disposal or arranged for transportation for disposal of waste materials, including hazardous substances, to the Site.

Response: Please see the response to question number 7.

Enclosed you will find the required Affidavit. Please direct any questions regarding this response or future correspondence regarding the Sanitary Landfill Company to me at the above address.

Sincerely,



Linda K. DiSantis  
Legal & Regulatory

LKD:dj

cc: Toshi Joji  
Pete Guinosso

State of Ohio                                 )  
  SS:  
County of Montgomery                     )

Peter Guinosso, after being duly sworn according to law, states of his own personal knowledge:

1. My name is Peter Guinosso.
2. I am employed as South Ohio District Plant Engineering Manager for United Parcel Service, Inc. (UPS).
3. In response to the United States Environmental Protection Agency's May 24, 1993, Request for Information Pursuant to Section 104(e) of CERCLA for the Sanitary Landfill Company (IWD) Site in Moraine, Ohio, UPS has performed a diligent record search and has performed a diligent interviewing process with employees of UPS who may have knowledge of the operations, use, storage, treatment, releases, spills, disposal or handling practices of hazardous waste by UPS.

Further Affiant Sayeth Not.

Peter Guinosso  
Peter Guinosso

Sworn to before me this  
15 day of July, 1993.

Notary

my commission Expires 10-9-97